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 Art of Living Foundation

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE

ART OF LIVING FOUNDATION, a
 California corporation,

Plaintiff,

v.

DOES 1-10, inclusive,

Defendants.

Case No.: CV 10-5022-LHK

**SECOND STIPULATION AND
~~PROPOSED~~ ORDER RE: FILING
 CERTAIN DOCUMENTS UNDER
 SEAL**

1 Pursuant to Local Rule 7-12 and 79-5 and General Order 62, the parties stipulate and
2 respectfully request this Court to permit the filing of certain exhibits under seal.

3 Plaintiffs have sued Doe Defendants alleging, among other things, Copyright Infringement and
4 Trade Secret Misappropriation, arising from alleged posting on the internet of certain documents
5 and/or links to certain documents, namely the Training Guide Phase One, the Continuation Manual,
6 and the Yes! Teacher Notes (collectively, the “Manuals”), the Breath Water Sound Manual
7 (“BWSM”), and a written description of Plaintiff’s processes for teaching Sudarshan Kriya,
8 Complaint, ¶¶ 39, 49, 68-70.

9 Defendants Doe/Klim and Doe/Skywalker have specially appeared and filed a Motion to
10 Dismiss, a Special Motion to Strike, and a Motion to Quash. In support of these motions, Defendant
11 Doe/Skywalker has filed a declaration, as to which he attached certain documents, some of which he
12 proposed to file under seal. The documents he proposed to file under seal were: what he understands
13 to be the “Sudarshan Kriya Notes” , **Exhibit B**, what he understands to be “Training Guide Phase 1,”
14 **Exhibit C**, what he understands to be “Yes+ Teacher Notes,” **Exhibit D** and what he understands to be
15 the BWSM, **Exhibit E**. Declaration of Doe/Skywalker, ¶ 9 (hereinafter “Proposed Sealed Exhibits”).
16

17 Doe/Skywalker has proposed to file these documents under seal solely so as not to
18 prejudice any rights that Plaintiff may have to assert Trade Secret rights or Copyrights as to such
19 documents in this litigation.

20 Plaintiffs stipulate to and respectfully request the Court to order that Defendants be
21 permitted to file the Proposed Sealed Exhibits under seal.

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1 Nothing in this Stipulation should be construed as a waiver, admission or concession by
2 either party regarding the factual, legal or evidentiary status of any of the Proposed Sealed Exhibits,
3 or of any right any party or third party may have to seek to have such Exhibits unsealed at some future
4 date.

5 Respectfully submitted,


7 KRONENBERGER BURGOYNE LLP

8
9 /s/
Jeffrey Rosenfeld
10 Attorney for Plaintiff Art of Living Foundation

11 /s/
12 Joshua Koltun
Attorney for Doe/Klim and Doe/Skywalker

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14 PURSUANT TO STIPULATION, IT IS SO ORDERED

15 Dated: May 17, 2011

16 
Hon. Lucy H. Koh
United States District Judge